

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**RONAIL BROWN, FREDERICK DAVIS,  
JR., ERIC VICKERS and JAMEZ  
WILLIAMS,**

**Plaintiffs,**

**v.**

**BESTWAY RENTALS, INC.**

**Defendant.**

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**CASE NO.: 2:06cv261-WHA**

**JOINT MOTION FOR STAY PENDING MEDIATION**

**COME NOW** the parties, by and through the undersigned counsel, and request of this Honorable Court a stay of all pending deadlines pending the outcome of mediation. As grounds for this motion, the parties state the following:

1. The parties have diligently engaged in discovery, which is ongoing. Defendant took Plaintiffs' depositions during the week of December 17, 2006. Plaintiffs have noticed depositions for the week of January 7, 2007.

2. After the recent depositions, the parties agreed to mediate. The parties are attempting to set a mediation date for the week of January 14, 2007, or January 21, 2007.

3. In an effort to conserve resources that may be used toward settlement, the parties desire to stay all pending deadlines and stay Plaintiffs' depositions.

4. Due to the upcoming depositions and the current dispositive motion deadline of January 29, 2007, if this Motion is not granted, the parties will have to expend additional resources,

which will in both parties' opinion frustrate potential resolution.

5. Once the parties have completed the mediation, the parties will promptly advise the Court of the outcome. If mediation is unsuccessful, the parties will request a new scheduling order from the Court to address all deadlines that are subject to the stay requested in this motion

6. This request is not made for the purposes of delay and the parties assert that no prejudice will be caused due to this extension.

**WHEREFORE**, for the foregoing reasons, the parties respectfully request this Honorable Court for a stay of all pending deadlines pending mediation.

**Dated this 2nd day of January 2007.**

s/Maricia Woodham

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(BEN050)

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